

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE:	§	
HOUSTON REAL ESTATE PROPERTIES, LLC,	§	Case No. 22-32998
<i>Debtor.</i>	§	Chapter 7
JOHN QUINLAN, OMAR KHAWAJA, and OSAMA ABDULLATIF,	§	
<i>Plaintiffs,</i>	§	
v.	§	
JETALL COMPANIES, INC., ARABELLA PH 3201 LLC, 9201 MEMORIAL DR. LLC, 2727 KIRBY 261, LLC, TEXAS REIT LLC, DALIO HOLDINGS I, LLC AND DALIO HOLDINGS II, LLC, HOUSTON REAL ESTATE PROPERTIES, LLC, SHAHAZ CHAUDHRI, ALI CHAUDHRI, SHEPHERD-HULDY DEVELOPMENT I, LLC, SHEPHERD- HULDY DEVELOPMENT II, LLC AND GALLERIA LOOP NORTH HOLDER, LLC; CYPRESS BRIDGECO, LLC, MAGNOLIA BRIDGECO, LLC, A KELLY WILLIAMS, AND OTISCO RDX, LLC,	§	Adversary No. 23-03141
<i>Defendants, Counter-Plaintiffs.</i>	§	

**JOHN QUINLAN, OMAR KHAWAJA, AND OSAMA ABDULLATIF'S**  
**RULE 26 SUPPLEMENTAL DISCLOSURES**

Pursuant to Rule 26 (a)(1) of the Federal Rules of Civil Procedure, as made applicable by Fed. R. Bankr. R. 7026, John Quinlan, Omar Khawaja, and Osama Abdullatif (“*Plaintiffs/Counter-Defendants*”), by and through their counsel of record, Hoover Slovacek LLP, makes the following initial disclosures.

**A. The names, addresses, and telephone numbers of individuals likely to have discoverable information, along with the subjects of that information, that Plaintiffs/Counter-Defendants may use to support its claims or defenses.**

	<b>Name, address, telephone</b>	<b>Subject(s) of discoverable or likely discoverable information</b>
1	John Quinlan c/o Steve Leyh and T. Michael Ballases Hoover Slovacek, LLP 5051 Westheimer, Ste 1200 Galleria Tower II Houston, Texas 77056 (713) 977-8686	Mr. Quinlan may testify about the facts surrounding his underlying judgment and attempts made by Defendants to engage in fraudulent transfers and other schemes in an effort to avoid payment as well as any other issue relevant to the facts and allegations of this case.
2	Omar Khawaja c/o Steve Leyh and T. Michael Ballases Hoover Slovacek, LLP 5051 Westheimer, Ste 1200 Galleria Tower II Houston, Texas 77056 (713) 977-8686	Mr. Khawaja may testify about the facts surrounding his underlying judgment and attempts made by Defendants to engage in fraudulent transfers and other schemes in an effort to avoid payment as well as any other issue relevant to the facts and allegations of this case.
3	Osama Abdullatif and Patricia Beth Mendez c/o Steve Leyh and T. Michael Ballases Hoover Slovacek, LLP 5051 Westheimer, Ste 1200 Galleria Tower II Houston, Texas 77056 (713) 977-8686	Mr. Khawaja may testify about the facts surrounding his underlying judgment and attempts made by Defendants to engage in fraudulent transfers and other schemes in an effort to avoid payment as well as any other issue relevant to the facts and allegations of this case.
4	Shahnaz Choudhri 4521 San Felipe St., Unit 3201 Houston, Texas 77027	Ms. Choudhri may testify about Mr. Choudhri utilizing Jetall and other business entities to hide assets, evade creditors and or shield his identity and involvement, in business dealings, as well as organizing, creating and operating, these sham business entities as an extension of himself and Jetall, and the comingling of funds as well as any other issue relevant to the facts and allegations of this case.

5	Mohammed Ali Choudhri a/k/a Ali Choudhri Stephanie A. Gallegos 1001 West Loop South, Suite 700 Houston, Texas 77027	Mr. Choudhri may testify about utilizing Jetall and other business entities to hide assets, evade creditors and or shield his identity and involvement, in business dealings, as well as organizing, creating and operating, these sham business entities as an extension of himself and Jetall, and the comingling of funds as well as any other issue relevant to the facts and allegations of this case.
6	A. Kelly Williams 12140 Wickchester Ln., Suite 100 Houston, Texas 77079	Mr. Williams may testify about Defendants' efforts to evade collection by engaging in a fraudulent transfer scheme with regard to certain properties as well as any other issue relevant to the facts and allegations of this case.
7	Chris Wyatt 406 Spring Lakes Haven Spring, Texas 77373	Mr. Wyatt may testify about Mr. Choudhri utilizing Jetall and other business entities to hide assets, evade creditors and or shield his identity and involvement, in business dealings, as well as organizing, creating and operating, these sham business entities as an extension of himself and Jetall, and the comingling of funds. He may also testify about Defendants' efforts to evade collection by engaging in a fraudulent transfer scheme with regard to certain properties as well as any other issue relevant to the facts and allegations of this case.
8	Manfred Sternberg 2 Blvd. Place 1700 Post Oak Blvd., Suite 600 Houston, Texas 77056	Mr. Sternberg may testify about Mr. Choudhri utilizing Jetall and other business entities to hide assets, evade creditors and or shield his identity and involvement, in business dealings, as well as organizing, creating and operating, these sham business entities as an extension of himself and Jetall, and the comingling of funds. He may also testify about Defendants' efforts to evade collection by engaging in a fraudulent transfer scheme with regard to certain properties as well as any other issue relevant to the facts and allegations of this case.
9	Jennifer MacGeorge 701 Tillery St., Suite 12 Austin, Texas 78702	Ms. MacGeorge may testify about Mr. Choudhri utilizing Jetall and other business entities to hide assets, evade creditors and or shield his identity and involvement, in business dealings, as well as organizing, creating and operating, these sham business entities as an extension of himself and Jetall, and the comingling of funds. She may also testify about Defendants' efforts to evade collection by engaging in a fraudulent transfer scheme with regard to certain properties as well as any other issue relevant to the facts and allegations of this case.
10	Gary Lancaster 12140 Wickchester Lane, Suite 111 Houston, Texas 77079	Mr. Lancaster may testify about Mr. Choudhri utilizing Jetall and other business entities to hide assets, evade creditors and or shield his identity and involvement, in business dealings, as well as organizing, creating and operating, these sham business entities as an extension of himself and Jetall, and the comingling of funds. He may also testify about Defendants' efforts to evade collection by engaging in a fraudulent transfer scheme with regard to certain

		properties as well as any other issue relevant to the facts and allegations of this case.
11	Ali Mokaram 2500 W Loop S., Suite 450 Houston, Texas 77027	Mr. Mokaram may testify about Mr. Choudhri utilizing Jetall and other business entities to hide assets, evade creditors and or shield his identity and involvement, in business dealings, as well as organizing, creating and operating, these sham business entities as an extension of himself and Jetall, and the comingling of funds. He may also testify about Defendants' efforts to evade collection by engaging in a fraudulent transfer scheme with regard to certain properties as well as any other issue relevant to the facts and allegations of this case.
12	James ("Trey") Vernon Young III 6611 Stoney River Dr. Spring, Texas 77379	Mr. Young may testify about Mr. Choudhri utilizing Jetall and other business entities to hide assets, evade creditors and or shield his identity and involvement, in business dealings, as well as organizing, creating and operating, these sham business entities as an extension of himself and Jetall, and the comingling of funds. He may also testify about Defendants' efforts to evade collection by engaging in a fraudulent transfer scheme with regard to certain properties as well as any other issue relevant to the facts and allegations of this case.
13	Ahmed Anosh 1708 River Oaks Blvd. Houston, Texas 77019	Mr. Anosh may testify about Mr. Choudhri utilizing Jetall and other business entities to hide assets, evade creditors and or shield his identity and involvement, in business dealings, as well as organizing, creating and operating, these sham business entities as an extension of himself and Jetall, and the comingling of funds. He may also testify about Defendants' efforts to evade collection by engaging in a fraudulent transfer scheme with regard to certain properties as well as any other issue relevant to the facts and allegations of this case.
14	Bradley S. Parker 2127 Bolsover St. Houston, Texas 77005 and 1911 Westheimer Rd. Houston, Texas 77098-1521	Mr. Parker may testify about Mr. Choudhri utilizing Jetall and other business entities to hide assets, evade creditors and or shield his identity and involvement, in business dealings, as well as organizing, creating and operating, these sham business entities as an extension of himself and Jetall, and the comingling of funds. He may also testify about Defendants' efforts to evade collection by engaging in a fraudulent transfer scheme with regard to certain properties as well as any other issue relevant to the facts and allegations of this case.
15	David G. Bollis 5420 LBJ Freeway, Suite 410 Dallas, Texas 75240	Mr. Bollis may testify about Mr. Choudhri utilizing Jetall and other business entities to hide assets, evade creditors and or shield his identity and involvement, in business dealings, as well as organizing, creating and operating, these sham business entities as an extension of himself and Jetall, and the comingling of funds. He may also testify about Defendants' efforts to evade collection by engaging in a fraudulent transfer scheme with regard to certain

		properties as well as any other issue relevant to the facts and allegations of this case.
16	Corporate Representatives as well as other employees for each of the Defendants including, Jetall Companies, Inc., Arabella PH 3201 LLC, 9201 Memorial Dr. LLC, 2727 Kirby 261, LLC, Texas REIT LLC, Dalio Holdings I, LLC, Dalio Holdings II, LLC, Houston Real Estate Properties, LLC, Shepherd-Huldy Development I, LLC, Shepherd-Huldy Development II, LLC, Galleria Loop North Holder, LLC; Cypress Bridgeco, LLC, Magnolia Bridgeco, LLC, Otisco rdX, LLC, MCITBE, LLC, Jetall/Croix Properties LP, and its general partner Jetall/Croix GP, LLC	These persons may testify about Mr. Choudhri utilizing Jetall and other business entities to hide assets, evade creditors and or shield his identity and involvement, in business dealings, as well as organizing, creating and operating, these sham business entities as an extension of himself and Jetall, and the comingling of funds. He may also testify about Defendants' efforts to evade collection by engaging in a fraudulent transfer scheme with regard to certain properties as well as any other issue relevant to the facts and allegations of this case.
17	Carolyn Nash	Ms. Nash may testify about Mr. Choudhri utilizing Jetall and other business entities to hide assets, evade creditors and or shield his identity and involvement, in business dealings, as well as organizing, creating and operating, these sham business entities as an extension of himself and Jetall, and the comingling of funds. She may also testify about Defendants' efforts to evade collection by engaging in a fraudulent transfer scheme with regard to certain properties as well as any other issue relevant to the facts and allegations of this case.
18	George Lee	Mr, Lee may testify about Mr. Choudhri utilizing Jetall and other business entities to hide assets, evade creditors and or shield his identity and involvement, in business dealings, as well as organizing, creating and operating, these sham business entities as an extension of himself and Jetall, and the comingling of funds. He

		may also testify about Defendants' efforts to evade collection by engaging in a fraudulent transfer scheme with regard to certain properties as well as any other issue relevant to the facts and allegations of this case.
19	Randy W. Williams c / o Timothy L. Wentworth <b>Houston Real Estate Properties, LLC</b> Okin Adams, LLP 1113 Vine St., Suite 240 Houston, Texas 77002 <a href="mailto:twentworth@okinadams.com">twentworth@okinadams.com</a>	Mr. Williams may testify about Mr. Choudhri utilizing Jetall and other business entities to hide assets, evade creditors and or shield his identity and involvement, in business dealings, as well as organizing, creating and operating, these sham business entities as an extension of himself and Jetall, and the comingling of funds. He may also testify about Defendants' efforts to evade collection by engaging in a fraudulent transfer scheme with regard to certain properties as well as any other issue relevant to the facts and allegations of this case.
20	Azeemeh Zaheer Michelin House 81 Fulham Road. South Kensington, ENGLAND SW3 6RD	Ms. Zaheer may testify about Mr. Choudhri utilizing Jetall and other business entities to hide assets, evade creditors and or shield his identity and involvement, in business dealings, as well as organizing, creating and operating, these sham business entities as an extension of himself and Jetall, and the comingling of funds. She may also testify about Defendants' efforts to evade collection by engaging in a fraudulent transfer scheme with regard to certain properties as well as any other issue relevant to the facts and allegations of this case.
21	T. Michael Ballases c/o Steve Leyh and T. Michael Ballases Hoover Slovacek, LLP 5051 Westheimer, Ste 1200 Galleria Tower II Houston, Texas 77056 (713) 977-8686	Mr. Ballases is an expert witness, who will testify about attorneys' fees. Without waiving the attorney-client and attorney work-product privileges, Mr. Ballases will testify in his expert capacity to the reasonable and necessary attorneys' fees incurred in this proceeding by all parties seeking recovery of attorneys' fees. Plaintiffs seek recovery of their fees. His opinion as to the reasonableness and necessity of attorneys' fees incurred by Plaintiffs from Hoover Slovacek LLP to date, and that are to be incurred through the trial and on appeal, if any, will be based on considering the following factors, as well as the work done by Hoover Slovacek LLP, the redacted bills of Hoover Slovacek LLP, which have been or will be produced and or that will be supplemented, and their knowledge of this case and their education, training, and experience, the novelty and difficulty of the questions involved and the skill required to perform the legal services properly, the likelihood that the acceptance of the particular employment would preclude other employment by the respective firm or attorney, the fee customarily charged in the locality for similar legal services, the dollar amount involved and the results obtained, the time limitations imposed by the client or the circumstances, the nature and length of the professional relationship

	<p>that respective firm or attorney has had with the client; and the experience, reputation and ability of respective firm or attorney. His opinion is that all attorneys' fees incurred by Plaintiffs are reasonable and necessary attorneys' fees and are recoverable. This expert anticipates that Plaintiffs will incur additional sums in attorneys' fees through trial and or final adjudication of this matter. The exact sums are increasing as more work is completed in this cause. Further, these experts may opine on any other parties' claim for attorneys' fees and aver that those claims and amounts, if sought, should not be recoverable and or are unreasonable and unnecessary. In the event of appeal to the Court of Appeals, this expert anticipates and opines that Plaintiffs will incur an additional \$70,500 in attorneys' fees for briefing, which is a reasonable and necessary amount. If a Motion for Rehearing or Rehearing En Banc is made to the Court of Appeals, then this expert's opinion is that Plaintiffs will incur an additional \$23,500.00 for each motion. If a Petition for Review is made to the Supreme Court, then this expert's opinion is that Plaintiffs will incur an additional \$23,500.00 for each motion. If Petition for Review is granted by the Texas Supreme Court, then this expert's opinion is that Plaintiffs will incur an additional \$32,900.00 for each motion. If oral arguments are requested and are conducted in connection with the granted Petition for Review before the Texas Supreme Court, then this expert's opinion is that Plaintiffs will incur an additional \$21,500.00 for each motion. If a Motion for Rehearing is made to the Supreme Court of Texas, then this expert's opinion is that Plaintiffs will incur an additional \$23,500.00 for each motion. Mr. Ballases's 2023 rate was \$425.00 and his 2024 is \$470.00. Moreover, the 2024 hourly rates for all Hoover Slovacek, LLP attorneys range from the youngest associates at \$250.00 to the most senior partner at \$610.00. This expert's opinion as to the reasonableness and necessity, if such be the case, of attorneys' fees incurred by the opposing party, through their attorneys, if any, will also be based on the above attorneys, and their knowledge of this case and their education, training, and experience. These experts may also testify that the attorneys' fees incurred by the opposing party's attorneys in this lawsuit are unreasonable and unnecessary, if recoverable at all, and should not be awarded to the opposing party. Plaintiffs incorporate herein by reference the expert's current resume that is found at the following website: <a href="https://hooverslovacek.com/attorneys/">https://hooverslovacek.com/attorneys/</a>.</p>
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**B. A copy or a description by category and location, of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.**

1	Communications by and between the parties	In possession of counsel for Plaintiffs/Counter-Defendants
2	Property records, including liens, deeds, and deeds of trust	In possession of counsel for Plaintiffs/Counter-Defendants
3	Legal filings, pleadings, and judgments	In possession of counsel for Plaintiffs/Counter-Defendants
4	Employee declarations	In possession of counsel for Plaintiffs/Counter-Defendants
5	Banking records	In possession of counsel for Plaintiffs/Counter-Defendants
6	Secretary of State filings	In possession of counsel for Plaintiffs/Counter-Defendants
7	Transcripts of testimony	In possession of counsel for Plaintiffs/Counter-Defendants
8	Agency agreements and management contracts	In possession of counsel for Plaintiffs/Counter-Defendants
9	Financial statements	In possession of counsel for Plaintiffs/Counter-Defendants

Plaintiffs/Counter-Defendants reserve the right to supplement these disclosures.

**C. A computation of each category of damages claimed by the disclosing party, who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.**

Plaintiffs/Counter Defendants damages are liquidated. Plaintiffs/Counter Defendants hold 3 judgments for which Defendants are liable. These include:

- a. On November 21, 2022, Plaintiff, Osama Abdullatif, obtained a final judgment in Cause No. 2013-41273, *Osama Abdullatif and Abdullatif & Company, LLC v. Ali Choudhri and Houston Real Estate Properties, LLC*; filed in the 334<sup>th</sup> Judicial District Court of Harris County (“Lawsuit 1”). In that case, HREP and Choudhri were found liable for statutory fraud and fraud in a real estate transaction, and Osama Abdullatif and Abdullatif & Company, LLC are the judgment holders.
- b. On February 17, 2023, Plaintiffs, John Quinlan, Omar Khawaja, and Osama Abdullatif, obtained an assignment of the judgment rendered on June 23, 2020, in Cause No. 2017-10832, *Jetall Companies, Inc. and Declaration Title Company,*



*LLC v. Allan B. Daughtry, Attorney at Law, Richard Heil, Todd Oakum and Renee Davy f/k/a Renee Oakum*; filed in the 152<sup>nd</sup> Judicial District Court of Harris County, Texas (“Lawsuit 2”). In this cause, Plaintiffs received assignments from both judgment-creditors against judgment-debtor, Jetall.

- c. Also on February 17, 2023, Plaintiffs, John Quinlan, Omar Khawaja, and Osama Abdullatif, obtained an assignment of the judgment rendered on October 31, 2020, in Cause No. 2020-38738, *Jetall Companies, Inc. v. Hoover Slovacek LLP*; filed in the 164<sup>th</sup> Judicial District Court of Harris County, Texas (“Lawsuit 3”). In this cause, Plaintiffs received an assignment from the judgment-creditor against judgment-debtor, Jetall.

Plaintiffs/Counter-Defendants are seeking payment of each of these judgments in full, as well as all applicable interest, costs, and fees, as mandated in each judgment. Copies of each judgment have been provided.

Plaintiffs/Counter-Defendants are also claiming that they are owed attorney’s fees and expenses if applicable and as authorized by Federal Law and/or Texas law as well as prejudgment and post-judgment interest.

Plaintiffs/Counter-Defendants specifically reserve the right to supplement and/or amend this response as discovery goes forward in this lawsuit.

**D. For inspection and copying as under Rule 34 any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

Not applicable.

DATED: November 26, 2024

Respectfully submitted,

**HOOVER SLOVACEK, LLP**



By: \_\_\_\_\_

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**ATTORNEYS FOR  
PLAINTIFFS/COUNTER-DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that, on November 26, 2024, a true and correct copy of John Quinlan, Omar Khawaja, and Osama Abdullatif's Motion for Summary Judgment was served electronically via the Court's CM/ECF system, and or as evidenced below.

**23-03141 Notice will be electronically mailed to:**

James Pope  
Jennifer MacGeorge  
**Jetall Companies, Inc., Arabella PH  
3201 LLC, 9201 Memorial Dr. LLC,  
2727 Kirby 26L LLC, Dalio Holdings  
I, LLC, Dalio Holdings II, LLC,  
Houston Real Estate Properties, LLC  
[Debtor], Shahnaz Choudhri, Ali  
Choudhri, Shepherd-Huldy  
Development I, LLC, Shepherd-  
Huldy Development II, LLC, Galleria  
Loop Note Holder LLC, Otisco rdX,  
LLC, MCITBE, LLC, Jetall/Croix  
Properties LP, and its general partner  
Jetall/Croix GP, LLC**  
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**Randy Williams  
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